

a

Gerard P. Fox  
gfox@gerardfoxlaw.com

May 15, 2024

**VIA CM ECF**

Hon. Sarah Netburn  
Thurgood Marshall Courthouse  
40 Foley Square  
New York, NY 10007

**Re: *Goldner v. Norris et al.***

Dear Judge Netburn,

Plaintiffs, Marc Goldner, Individually and as Officer of Golden Bell Entertainment, LLC, a California company, and Golden Bell Studios, LLC, Golden Bell Entertainment, LLC, a Nevada company, and Golden Bell Studios, LLC, write this letter motion seeking a brief, 30 day extension of the currently pending deadlines of May 15, 2024 to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and the May 30, 2024 deadline to file a motion for leave to amend the Complaint, if any.

President and Chief Creative Officer of Golden Bell, Rachel Korsen's, mother has been diagnosed with cancer and had surgery recently and is consulting with physicians this week regarding further treatment options, and Ms. Korsen and Mr. Goldner have been taken from their business duties to attend to these life altering concerns. Both Ms. Korsen and Mr. Goldner have been unable to review and assess their counsel's analysis and recommendations regarding their claims as a result of the cancer treatment and related obligations, and have requested a short continuance of the current deadlines to provide them with time to consider their claims and how Plaintiffs will proceed in this matter.

My office has conferred with counsel for the Andrews McMeel defendants, and counsel for Mr. Norris, and both have consented to the extension of time. Given the extenuating circumstances, and the intention to provide Plaintiffs with adequate time to evaluate their claims,

a



we respectfully request that this Court grant a 30-day extension of time to June 14, 2024, to file a stipulation to dismiss the claims against the Andrews McMeel defendants, and to July 1, 2024, to file a motion for leave to amend, if any. There has been one prior request for an extension of time.

RESPECTFULLY SUBMITTED,  
GERARD FOX LAW P.C.

By: 

---

Gerard P. Fox  
1880 Century Park E Suite 1410  
Los Angeles, CA 90067  
Tel: (310)-441-0400  
[gfox@gerardfoxlaw.com](mailto:gfox@gerardfoxlaw.com)  
*Counsel for Plaintiffs*  
*Admitted Pro Hac Vice*